



# Department of Pesticide Regulation



Mary-Ann Warmerdam  
Director

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ENF 06-06  
WHS 06-01

TO: County Agricultural Commissioners

SUBJECT: ETHEPHON AND MEDICAL SUPERVISION

Recently, a question was raised about whether use of ethephon (Ethrel, Proxy, CottonQuick, etc.) triggered medical supervision requirements.

3 CCR 6728(a) states: "Whenever an employee mixes, loads, or applies, a pesticide with the signal word "DANGER" or "WARNING" that contains an organophosphate or carbamate, for the commercial or research production of an agricultural plant commodity, the employer shall maintain use records that identify the employee, the name of the pesticide, and the date of use. The original or copies of documents otherwise required to be maintained by this chapter may be used to meet the requirements of this Section provided they contain the information required by this Section." 3 CCR 6728(b) states: "Each employer who has an employee who regularly handles pesticides specified in (a) shall have a written agreement signed by a physician, that includes the names and addresses of both the physician providing the medical supervision and the employer responsible for the employees, stating that the physician has agreed to provide medical supervision..."

The U.S. Environmental Protection Agency (U.S. EPA) states in its Ethephon Reregistration Eligibility Decision (R.E.D.) Facts fact sheet that ethephon is an organophosphate pesticide that has caused plasma cholinesterase inhibition in a 16-day oral human study and clinical signs of toxicity in second study (<http://www.epa.gov/oppsrrd1/REDs/factsheets/0382fact.pdf>). Twenty-one products are currently registered for use in California. With the exception of 4 home and garden products, all products have the signal word "Danger" on the label.

Therefore, since ethephon is an organophosphate pesticide with the signal word "Danger" on the label, use of ethephon triggers the medical supervision requirements.

If you have any questions pertaining to this document, please contact your Enforcement Branch Liaison.

Sincerely,

*(original signed by S. Paulsen)*

*(original signed by S. Edmiston for  
C. Andrews)*

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cc: Mr. Jim Shattuck, Agricultural Commissioner Liaison

